

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

Caption in Compliance with D.N.J. LBR 9004-1(b)

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<p>In re:</p> <p>LTL MANAGEMENT LLC,¹</p> <p style="text-align: center;">Debtor.</p>	<p>Chapter 11</p> <p>Case No.: 23-12825 (MBK)</p> <p>Honorable Michael B. Kaplan</p>
<p>LTL MANAGEMENT LLC,</p> <p style="text-align: center;">Plaintiff,</p> <p style="text-align: center;">v.</p> <p>THOSE PARTIES LISTED ON APPENDIX A TO COMPLAINT and JOHN AND JANE DOES 1-1000,</p> <p style="text-align: center;">Defendants.</p>	<p>Adv. Pro. No. 23-01092 (MBK)</p>

AMENDED NOTICE OF APPEAL AND STATEMENT OF ELECTION

Part 1: Identify the Appellant(s):

1. **Names(s) of appellant(s):** The Official Committee of Talc Claimants.
2. **Position of appellant(s) in the bankruptcy case that is the subject of this appeal:**

Appellant is an official committee of tort claimants in the underlying bankruptcy case. Appellant is also an intervenor in Adversary Case No. 23-01092 (MBK).

¹ The last four digits of the Debtor's taxpayer identification number are 6622. The Debtor's address is 501 George Street, New Brunswick, New Jersey 08933.

Part 2: Identify the subject of this appeal:

1. Describe the judgment, order, or decree appealed from: Appellant, pursuant to 28 U.S.C. § 158(a) and Federal Rules of Bankruptcy Procedure 8001(a), hereby gives notice of appeal to the United States District Court for the District of New Jersey from each and every part of the order of the United States Bankruptcy Court for the District of New Jersey of as follows:

(a) the Order of April 20, 2023 granting in part the relief sought by Debtor's Motion For An Order (I) Declaring That The Automatic Stay Applies Or Extends To Certain Actions Against Non-Debtors, (II) Preliminarily Enjoining Such Actions, And (III) Granting A Temporary Restraining Order Ex Parte Pending A Hearing On A Preliminary Injunction (annexed hereto, as **Exhibit "A,"** is a copy of the Transcript of the United States Bankruptcy Court's ruling read into the record on April 20, 2023 (Adversary Case No. 23-01092 (MBK))); and

(b) the Order of the same date granting a preliminary injunction prohibiting the commencement or continuation of any trial against any of the protected parties identified in Appendix B to the verified complaint in Adversary Case No. 23-01092 (MBK), as amended, through and including June 15, 2023 (see *Exhibit "A"* annexed hereto);

(c) the Bench Order of the Court of the same date (see *Exhibit "A"* annexed hereto);

(d) [*amendment*] the Order Dissolving Temporary Restraining Order, Extending the Automatic Stay, and Granting Limited Preliminary Restraints, filed April 25, 2023 (Adversary Case No. 23-01092 (MBK)) (annexed hereto as **Exhibit "D";** and

(e) [*amendment*] the Memorandum Opinion by Chief Judge Michael B. Kaplan, United States Bankruptcy Court, District of New Jersey in support of the Order Dissolving Temporary

Restraining Order, Extending the Automatic Stay, and Granting Limited Preliminary Restraints, filed April 27, 2023 (Adversary Case No. 23-01092 (MBK)) (annexed hereto as **Exhibit “E”**).

2. State the date on which the judgment, order, or decree was entered: The Bench Order (see *Exhibit “A”* annexed hereto) was issued on April 20, 2023. [Amendment] The Order Dissolving Temporary Restraining Order, Extending the Automatic Stay, and Granting Limited Preliminary Restraints (see *Exhibit “D”* annexed hereto) and the Memorandum Opinion by Chief Judge Michael B. Kaplan, United States Bankruptcy Court, District of New Jersey in support of the Order Dissolving Temporary Restraining Order, Extending the Automatic Stay, and Granting Limited Preliminary Restraints (see *Exhibit “E”* annexed hereto) were entered on April 25, 2023 and April 27, 2023, respectively.

Part 3: Identify the other parties to the appeal:

List the names of all parties to the judgment, order, or decree appealed from and the names, addresses, and telephone numbers of their attorneys:

Party	Attorneys
Appellant: the Official Committee of Talc Claimants	GENOVA BURNS LLC Daniel M. Stolz, Esq. Donald W. Clarke, Esq. dstolz@genovaburns.com dclarke@genovaburns.com 110 Allen Road, Suite 304 Basking Ridge, NJ 07920 Tel: (973) 467-2700 Fax: (973) 467-8126 BROWN RUDNICK LLP David J. Molton, Esq. Robert J. Stark, Esq. Michael S. Winograd, Esq. Eric R. Goodman, Esq. dmolton@brownrudnick.com rstark@brownrudnick.com

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Appellee - Plaintiff: LTL Management, LLC	<p>WOLLMUTH MAHER & DEUTSCH LLP Paul R. DeFilippo, Esq. pdefilippo@wmd-law.com 500 Fifth Avenue New York, NY 10110 Tel: (212) 382-3300 Fax: (212) 382-0050</p> <p>JONES DAY Gregory M. Gordon, Esq. Brad B. Erens, Esq. Dan B. Prieto, Esq. Amanda Rush, Esq. gmgordon@jonesday.com bberens@jonesday.com dbprieto@jonesday.com asrush@jonesday.com 2727 N. Harwood Street Dallas, TX 75201 Tel: (214) 220-3939 Fax: (214) 969-5100</p>
Defendants (see Exhibit B)	See Exhibit B
Interested party: the Protected Parties (see Exhibit C)	See Exhibit C
Interested party/objector: Arnold & Itkin LLP	<p>PACHULSKI STANG ZIEHL & JONES LLP Laura Davis Jones Colin R. Robinson Peter J. Keane ljones@pszjlaw.com crobinson@pszjlaw.com pkeane@pszjlaw.com 919 N. Market Street, 17th Floor Wilmington, DE 19801 Telephone: (302) 652-4100 Facsimile: (302) 652-4400</p>

<p>Interested party/objector: Paul Crouch, Individually and as Executor and as Executor Ad Prosequendum of the Estate of Cynthia Lorraine Crouch</p>	<p>LEVY KONIGSBERG, LLP Jerome H. Block jblock@levylaw.com 605 Third Avenue, 33rd FL New York, NY 10158 Tel: (212) 605-6200 Fax: (212) 605-6290</p> <p>THE RUCKDESCHEL LAW FIRM, LLC Jonathan Ruck Deschel ruck@rucklawfirm.com 8357 Main Street Ellicott City, Maryland 21043</p>
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Interested party/objector: Travelers Casualty and Surety Company (f/k/a The Aetna Casualty and Surety Company)	<p>GIMIGLIANO MAURIELLO & MALONEY A Professional Association Stephen V. Gimigliano John Maloney Robin Rabinowitz sgimigliano@lawgmm.com jmaloney@lawgmm.com rrabinowitz@lawgmm.com 163 Madison Avenue, Suite 500 P.O. Box 1449 Morristown, New Jersey 07962-1449 (973) 946-8360</p> <p>SIMPSON THACHER & BARTLETT, LLP Andrew T. Frankel Michael H. Torkin Kathrine A. McLendon Jonathan Mitnick afrankel@stblaw.com michael.torkin@stblaw.com kmclendon@stblaw.com jonathan.mitnick@stblaw.com 425 Lexington Avenue New York, New York 10017 Tel: (212) 455-2000</p>
Interested party/objector: United States Trustee	<p>THE OFFICE OF THE UNITED STATES TRUSTEE, ANDREW R. VARA, UNITED STATES TRUSTEE, REGIONS 3 & 9 Jeffrey M. Sponder, Esq. Lauren Bielskie, Esq. Linda Richenderfer, Esq. jeffrey.m.sponder@usdoj.gov lauren.bielskie@usdoj.gov linda.richenderfer@usdoj.gov One Newark Center, Suite 2100 Newark, NJ 07102 Tel: (973) 645-3014 Fax: (973) 645-5993</p>
Interested party/objector: Mesothelioma Plaintiff Katherine Tollefson and Certain Mesothelioma Plaintiffs	<p>MAUNE RAICHLE HARTLEY FRENCH & MUDD, LLC Clayton L. Thompson, Esq. cthompson@mrfmlaw.com Suzanne M. Ratcliffe, Esq. sratcliffe@mrfmlaw.com</p>

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Part 4: Not Applicable (No BAP in this District)

Part 5: Signature

DATED this 2nd day of May 2023.

Respectfully submitted,

GENOVA BURNS, LLC

By: /s/ Daniel M. Stolz

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